From Grace Chan, Metropolitan Water District of Southern California
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Comments to the June 7, 2004 Draft

Volume 1

South Coast Hydrologic Region (Ch. 2, p.11)

1. Put in similar language about perchlorate and chromium as found in the Colorado River Hydrologic Region on p. 14
2. Also add in concern about uranium tailings at Moab for both regions.
3. Not sure what the statement "local supplies face water quality problems associated with increased use of recycled water and marginal quality groundwater during droughts" refers to. It is not an accurate statement for the MWD service area. The only concern for us would be higher salinity of imported supplies during drought causes recycled water at certain locations not usable due to salinity exceeding 1000 mg/L TDS.

Trend from Statewide Solutions to Regional Reliability (Ch. 2, p.16)

Throughout California stakeholders are beginning to work together within regions and watersheds [suggest to add] and partnering with entities in other regions to develop programs….

Regional Water Management (Ch. 2, p. 16)

Conjunctive use of surface imported supplies and local groundwater basins is another important regional water management that should be added to the list in the first paragraph. Regional water management should not be restricted to managing local supplies since 2/3 of the state uses imported water to various extent, even the San Francisco Bay region.

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Volume 3

Chapter 5. South Coast Hydrologic Region

Please provide backup or cite where the source of data when numbers are used. I like to know the projects that make up 100,000 acre-feet per year of desalinated brackish groundwater. (p. 3) MWD service area has 38,000 AF in our program and 18,000 AF by local agencies for a total of 56,000 AF. I am not aware that 44,000 AF occurs in the South Coast Region outside of MWD.

Likewise, like to know the source of 400,000 AF <u>increase</u> in recycled water use in the next decade (p.3). MWD's Integrated Resources Plan calls for an increase 220,000 AF of replacement of potable supplies from now to 2020. Note that not all recycled water use replaces potable water consumption, some could be used to support additional groundwater production. If 400,000 AF is to occur in South Coast Region, a lot will be occurring outside of MWD service area or within MWD financial contribution. This would be unlike historical trends.

The increase of 150,000 AF of desalinated groundwater over the next decade (p. 3) is way beyond what MWD's Integrated Resources Plan has identified from its member agencies. MWD's IRP is targeting 39,000 AF of increase by 2020 (95,000 AF by 2020 versus 56,000 AF in production.)

Page 7, first paragraph, need to add in the resolution of the historical groundwater overdraft since this is the *State of the Region* description and the overdraft conditions are being managed. The resolutions include: seawater barrier built to curtail seawater intrusion, integrating groundwater basin management with replenishment of imported resources to remedy overdraft condition, and adjudication of groundwater basins or establishment of a groundwater management agency to prevent over extraction.

Page 8, first paragraph, SDCWA Emergency Storage Project adding 900,100 AF of storage capacity within the county sounds high. Please confirm with SDCWA.

Page 10, third paragraph. Please provide reference for "Brackish groundwater desalting delivers about 100,000 AF of water today and will increase to approximately 250,000 AF during the next decade." Take care that the brackish groundwater desalting is actually used consumptively; please state if the amount includes treatment to meet discharge requirements and not use to replace potable water demands.

Page 11, fourth paragraph. MWA and MWD have an agreement not an accord. "Under the ~~accord~~ <u>agreement</u>…"

Page 12, Looking to the Future section is repetitive of the accomplishments and does not mention water conservation or water use efficiency.

Page 12, IRP box. MWD Integrated Water Resources Plan is termed the 2003 Update and is scheduled by Board approval in July 2004. It is currently termed 2003 Update as all of the analysis was done in 2003, only outreach was done in 2004. I will let you know in mid-July if a name change occurred.

Page 13, third paragraph. Please check with SDCWA on its plan for desalination; it is not conducting environmental work for the Carlsbad site.

Page 15, second paragraph. The maximum storage of the North Las Posas project (as opposed to the South Las Posas basin) is 210,000 acre-feet (not 300,000 AF).